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2 3	MARTHA BOERSCH (CABN 126569) Chief, Criminal Division	
4 5 6 7 8 9 110	ERIC CHENG (CABN 274118) AJAY KRISHNAMURTHY (CABN 305533) ALETHEA M. SARGENT (CABN 288222) Assistant United States Attorneys 1301 Clay Street, Suite 340S Oakland, California 94612 Telephone: (510) 637-3680 FAX: (510) 637-3724 eric.cheng@usdoj.gov ajay.krishnamurthy@usdoj.gov alethea.sargent@usdoj.gov Attorneys for United States of America	
11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRICT OF CALIFORNIA	
13	OAKLAND DIVISION	
14	UAKLA	AND DIVISION
15	UNITED STATES OF AMERICA,) CASE NO. 4:23-CR-00267 JSW
16	Plaintiff,) STIPULATION TO UNSEAL DOCKET ENTRIES AND [PROPOSED] ORDER - AS MODIFIED
17	v.	TO RESET TIME OF APRIL 15, 2025 STATUS CONFERENCE TO 1:00 P.M.
18	TIMOTHY ALLEN MANLY WILLIAMS,)) Re: Dkt. No. 56
19	Defendant.)
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	STIPULATION TO UNSEAL DOCKET ENTRIES AND [PROPOSED] ORDER Case No. 4:23-cr-00267 JSW	

The parties respectfully request that the following docket entries be unsealed: 1 2 November 28, 2023: Minute Entry for Change of Plea Hearing; 3 November 28, 2023: Dkt. No. 38 (Plea Agreement); 4 November 5, 2024: Dkt. No. 54 (Order re: Joint Status Report and Stipulation to Continue 5 Status Conference). 6 The status conference currently set for April 15, 2025 also need not be under seal. 7 The undersigned Assistant United States Attorney certifies that he has obtained approval from 8 counsel for Defendant to file this stipulation and proposed order. 9 IT IS SO STIPULATED. DATED: March 13, 2025 10 ERIC CHENG 11 AJAY KRISHNAMURTHY ALETHEA SARGENT Assistant United States Attorneys 12 13 **DATED:** March 13, 2025 RANDY SUE POLLOCK 14 Counsel for Defendant TIMOTHY ALLEN 15 MANLY WILLIAMS 16 17 18 19 20 21 22 23 24 25 26 27 28

STIPULATION TO UNSEAL DOCKET ENTRIES AND [PROPOSED] ORDER Case No. 4:23-cr-00267 JSW

PROPOSED ORDER - AS MODIFIED

Based upon the stipulation of the parties, IT IS HEREBY ORDERED that the following items be unsealed:

- November 28, 2023: Minute Entry for Change of Plea Hearing;
- November 28, 2023: Dkt. No. 38 (Plea Agreement);
- November 5, 2024: Dkt. No. 54 (Order re: Joint Status Report and Stipulation to Continue Status Conference); and
- April 15, 2025: Status Conference Hearing.

The Court further ORDERS that the status hearing currently set for April 15, 2025 at 10:00 a.m. be RESET to April 15, 2025 at 1:00 p.m.

IT IS SO ORDERED.

DATED: March 13, 2025

HOW. JUSTINEY S. WHITE Unted States District Judge

STIPULATION TO UNSEAL DOCKET ENTRIES AND [PROPOSED] ORDER Case No. 4:23-cr-00267 JSW